

**DECLARATION OF ANNE MULLIS
PURSUANT TO 28 U.S.C. § 1746**

I, Anne Mullis, hereby depose and swear as follows:

1. My name is Anne Mullis. My ex-husband, Gary Mullis, and I adopted a baby who was Gary's biological nephew. Gary's sister passed away when her youngest child was an infant. His name is Travis James Wallace. We call him "TJ." After we adopted TJ, we had his last name changed from Wallace to Mullis.

2. I did not know TJ's biological mother even though she was my sister-in-law. She and Gary had no real relationship. He was basically ashamed of her and her lifestyle. She had several children all with different men. She was also morbidly obese.

3. After we took custody of TJ, I tried several times to connect with Gary's half siblings and family by sending cards and pictures of TJ. Gary's mother did not like me and eventually all ties were broken with that side of the family. Gary was not close with his mother either. She had walked out of the marriage when he was young, leaving him with his father, who was kind of rough around the edges. It also came out later during Gary's trial for sexually abusing TJ that Gary was sexually abused by his mother.

4. TJ was a troubled child. When he was around three and four years old, TJ would bang his head on the headboard of our bed. He'd bang his head against other things as well, including the large bedposts. It was very solid material and no question hurt him. He'd talk about fire and wanting to burn things down. I was concerned about his behavior, so I took him to see a therapist named Sallyann Jennings. TJ did individual counseling sessions with her for about three or four years. It was not family therapy so I was not involved in the sessions.

5. When TJ was little, I was the primary breadwinner of the household. I worked the

three to eleven shift during that time. Gary took care of TJ while I worked. Gary often worked the eleven to seven shift. His father would watch TJ for the time in between Gary leaving for work and me getting home. As I said, he was kind of rough around the edges, but you could tell he cared for TJ.

6. Gary would sometimes take TJ to his therapy sessions. Through Ms. Jennings therapy work, it eventually came out that Gary was molesting TJ. Ms. Jennings asked Gary about it and he admitted to it. TJ had tried to tell me what was happening before. He said to me, "Daddy is kissing my pee pee." Unfortunately, I did not believe him until some time later when Gary admitted it. After that I was kicking myself for not having done something about it when TJ first told me. I have always felt bad about that.

7. I kicked Gary out of the house after this all came out and we eventually divorced. It was tough for TJ because he had been close with Gary, but I had no choice. Gary's father also cut TJ out of the picture after the abuse came out. It was a shame, because all of the male figures in TJ's life then were gone.

8. TJ continued to have therapy with Ms. Jennings for awhile. However, he then started acting out sexually. It was clear to me that the therapy wasn't working. I took TJ out of therapy with Ms. Jennings for that reason.

9. After Gary was released from prison, he tried to get visitation rights with TJ. TJ was probably about nine years old then. I remember a meeting with a therapist, about whether that would be allowed. During the meeting, TJ lost it and started punching Gary and screaming. It was a strange thing to see this very small child hitting this very large man. It was like a role reversal. Then TJ bolted out of the office and locked himself in my car. Sometime later I was told that Gary would not be granted visitation.

10. TJ started taking Ritalin in the third grade for ADHD. It seemed to help but he always had difficulty in school. I remember that I had to push to get the school to have him repeat fifth grade. He was not ready for middle school. It seemed to me that the school just wanted to get him out of there. I kept pushing and finally they agreed to hold him back. I had a good relationship with TJ's pediatrician and we tried to keep him off medication as long as we could. I remember once, when TJ was in the pediatrician's office, the doctor told me he was so proud of me for ignoring TJ when he was having a tantrum. I knew to do that and would not give in.

11. When TJ reached puberty, the garbage really hit the fan. Everything fell apart. One night after TJ threatened to kill himself, we were in the emergency room. His emotions were bouncing off the walls. One minute he was crying, calling me "mommy," and telling me he loved me. The next minute he was talking about wanting to blow things up. He was like a ping pong ball. I told the crisis counselor, "this child is bipolar." Before that, his diagnosis had not included bipolar, but ADHD. This was when TJ was in sixth grade and he was in and out of Sheppard Pratt Psychiatric Hospital.

12. When TJ was about thirteen, he was accused of molesting his cousin. Her father Steven is my brother. He and TJ had grown close since everything had happened with Gary. Steven tried to help be a male role model for TJ. After the abuse allegation of Steven's daughter, he cut TJ out of all of their lives completely. TJ was eventually sent to The Jefferson School for sex offender treatment.

13. TJ was doing better at The Jefferson School than he had in the regular school system. His grades were good and he needed the structure. There was no question about his day-to-day activities. He was told when to get up, when to take his meds and when to go to school. When he would get in trouble there, the school would deal with it by putting him in an isolation room or

otherwise punishing him. This structured setting was really good for him.

14. TJ's release from The Jefferson School was abrupt. All of a sudden, they told me that he had completed the program. I thought he had at least another year there. It was a scramble to get him enrolled in the public school because he was released right at the beginning of the school year.

15. TJ was put in regular full time classes without treatment. I complained to the school but they said there was nothing they could do. They refused to put him into special education classes and did not even develop an individual education plan for him. It was a disaster. I thought they were just trying to get rid of him. It ultimately worked. He was truant often and eventually stopped going to school. He was supposed to be on probation at that time too. He wasn't doing what he was supposed to in terms of that as far as I could tell, but his probation officer never did anything about it. I was hoping the probation would give TJ some of that structure that he needed.

16. TJ was at home with me for around a year before he moved to Texas. His mental illness was out of control and he would not take his medication. Once he turned 18, I basically told him he needed to take his medications or get out. I was completely overwhelmed and had no idea what to do with him. He eventually decided to leave. He told me some woman he'd met online said he could stay with her. Once I had confirmed this was true, I bought him a plane ticket.

17. TJ would call me around once a week when he was living in Texas. I had to take everything he told me with a grain of salt because I knew he wasn't taking his medications. At one point he told me his girlfriend was pregnant. I obviously was not happy about that and told him so.

18. The night TJ killed Alijah, he called me in the middle of the night. He told me he was trying not to get into trouble, but that he had just been somewhere with a child and attempted to fondle her. He told me he hadn't touched her. I told him he knew better than to do that. I yelled at him and asked him what the heck he was doing in that situation. He sounded bad, but there was

really nothing I could do for him then.

19. After TJ's arrest, a mitigation specialist named Gina called me. We spoke on the phone and I emailed her, but we never met in person. I never spoke with any lawyers working on TJ's case. At the time, I remember thinking there wasn't anything I could do or say that might help TJ. I knew TJ to be a very disturbed individual. I had seen him off his meds and in manic episodes. This all seemed to be negative information. I told Gina that on the phone and nobody ever contacted me again.

20. Recently, TJ's lawyer from Philadelphia and a social worker came to see me. Once we started talking, they explained to me that the information I was telling them was helpful. I love TJ and have always wanted to help him. If his trial lawyers had explained to me how what I knew could be helpful, I would have been willing to answer any questions and I would have testified at TJ's trial if I was asked.

I hereby certify that the facts set forth above are true and correct to the best of my personal knowledge, information, and belief, subject to the penalty of perjury, pursuant to 28 U.S.C. § 1746

 7/15/13
Anne Mullis